

In The United States District Court  
For The Middle District of Alabama  
Northern Division

William David Carroll

Plaintiff

V.

Anthony Clark

Annoth Cain

Millard H. McWhorter III M.D.

Defendants

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Civil Action No.

2:06-CV-549-MEF

Motion To Warrant Consideration by the Court  
and Motion For Leave To Amend;

Comes now the plaintiff William David  
Carroll pro, se, moves the honorable court  
for a Warrant Consideration, and for  
leave to Amend and as therefore states  
the following grounds,

Interrogatories

- 1 How many inmates are on this long list to  
see the dentist?
- 2 How many inmates have been seen by the  
dentist since June 12<sup>th</sup> 2006 untill present  
date?

- 3 What is the dentist's name that treated these inmates?
- 4 What are the names of the inmates that have been treated or seen by the dentist since June 12<sup>th</sup>, 2006 untill present date, and what are the dates in which each one was treated or seen by the dentist?
- 5 What number am I on your dental list?
- 6 How is the County billed for inmate dental visits?
- 7 How often does the County pay the dental bill?
- 8 Why won't the dentist see or treat anyone from the Covington County Jail?
- 9 Does the Covington County Jail have a dentist?
- 10 Does the Covington County Jail have an unpaid dental bill?
- 11 On what date was bill paid?

- 12 Why does it take over (30) days to see a dentist when you have a dental emergency?
- 13 What is considered a dental emergency at the Covington County Jail?
- 14 How many times have I been to sick-call since June 12<sup>th</sup>, 2006 involving the same abscessed tooth?
- 15 Has my tooth been abscessed (2) different times within a (3) week period?
- 16 Why do I have to keep signing up for sick-call every (7) days and repay a medical co-payment for a continuing or on going problem that could be solved by seeing a dentist?
- 17 What is the date of my dental appointment?
- 18 Do I have a dental appointment date?
- 19 What is the long term effect of my taking these medications for extended periods?
- 20 What is the normal/extended time limit

on each dosage prescribed to me?

- 21 Haven't people died from having abscessed teeth?
- 22 What is the long term affect on having an abscessed tooth for an extended time period?
- 23 Is it normal for a medical staff to continue to put off treatment to a permanent solution?
- 24 Why am I being denied dental treatment?

Respectfully submitted this the 13<sup>th</sup> day of  
July, 2006. William David Carroll

Signature of Plaintiff

Certificate of Service

I certify that a true copy of the foregoing Amend  
has been served upon the defendants, by mailing  
the same United States mail first class, personal  
service on the 13<sup>th</sup> day of July, 2006.  
Copies served upon all William David Carroll  
defendants:

Signature of Plaintiff

Anthony Clark

Ameth Crain

Millard H. McWhorter III M.D.